

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioFILED  
RICHARD W. NAGEL  
CLERK OF COURT

3/17/21

United States of America

v.

Raheem Goff

Case No. 3:21MJ105

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
WEST. DIV. DAYTON*Defendant(s)*

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2020 in the county of Montgomery in the  
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*

18 USC s. 922(g)(1) &amp; 924(a)(2)

felon knowingly in possession of a firearm

This criminal complaint is based on these facts:

See Attached Affidavit of Michael Fuller

☒ Continued on the attached sheet.*Michael Fuller**Complainant's signature*

Michael Fuller, TFO of the FBI

*Printed name and title*

Via FaceTime

Sworn to before me and signed in my presence.

Date: 3/17/21City and state: Dayton, Ohio*signature*US Magistrate Judge  
*me and title*

## **AFFIDAVIT**

Your Affiant, Michael T. Fuller, being duly sworn, hereby deposes and states as follows:

### **INTRODUCTION**

1. Your Affiant has been a law enforcement officer with the Dayton Police Department since 2001. Your Affiant is currently assigned as a Task Force Officer (TFO) on the Federal Bureau of Investigation's Southern Ohio Safe Streets Task Force (SOSSTF). As such, your Affiant is charged with investigating crimes against the United States of America, including but not limited to violations of Title 18 and Title 21 of the United States Code (U.S.C.). Your Affiant has received training in drug trafficking investigations and has participated in numerous narcotics-related investigations (ultimately leading to successful prosecution) that involved surveillance, gathering evidence of money laundering, interviewing suspected drug traffickers, and supervising the activities of informants who provided information and assistance which resulted in the seizure of narcotics. Your Affiant is familiar with federal drug laws, and is aware that it is a violation of Title 21, United States Code, Sections 841(a)(1) and 846 to knowingly and intentionally distribute and possess with intent to distribute controlled substances (including heroin and cocaine), as well as to conspire to do the same. Further, your Affiant is aware of federal firearm laws and knows that possessing firearms in furtherance of a drug trafficking crime is a violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2. In addition, your Affidavit is aware the possession of a firearm by a convicted felon is a violation of Title 18, United States Code, Section 922(g)(1).

### **PURPOSE OF AFFIDAVIT**

2. This Affidavit is submitted in support of a criminal complaint, and seeks the issuance of an arrest warrant against, Raheem Goff for the violation of: 18 U.S.C. §§ 922(g)(1)

and 924(a)(2) (possession of a firearm by a convicted felon). The information contained in this Affidavit is largely based upon an investigation conducted by your Affiant and other law enforcement officers. All of the details of the investigation are not included in this Affidavit, rather only information necessary to establish probable cause of the above-described violations.

### **SUMMARY OF PROBABLE CAUSE**

3. On December 1, 2020, at approximately 11:22 p.m., Dayton Police Department (DPD) Officer Joshua Erwin observed a 2020 Ford Fusion, Virginia license plate ULF7667, traveling south on McArthur Avenue near Tubman Avenue, in the City of Dayton, Ohio. Officer Erwin noted the vehicle had dark window tint and license plates belonging to a towed vehicle. Officer Erwin turned to travel behind the vehicle. When at 3107 Tubman Avenue, the vehicle quickly parked, blocking the driveway of a home. The driver, later identified as Raheem GOFF, exited the vehicle and walked inside the residence. Officer Erwin used his flashlight to look inside the vehicle and observed a handgun lying on the driver's seat of the car.

4. Officer Erwin requested additional crews, and DPD Officer Mercer and Officer White responded to assist. After several minutes of knocking on the front door of the residence that the officer had observed GOFF enter, a woman exited the home. The woman was asked who just ran inside of the residence, and she replied, "Raheem just got here to see his kids." Police contacted a second woman who said that there was no man inside of the residence. A short time later, Raheem GOFF came to the front door of the residence, where he was detained. Officer Erwin positively identified GOFF as the person that he saw exit the vehicle. Officer Erwin explained to GOFF the reason for his detention, and GOFF stated: "It ain't mine; I can't even be around guns." At this time, Officer Erwin placed GOFF under arrest.

5. The handgun located on the driver seat of the Ford Fusion was recovered and found to be a .45 caliber Smith & Wesson M&P Shield, serial number HWY7669, loaded with 8 live rounds. A search of the vehicle also revealed suspected cocaine and an unknown pill in the center console. The firearm and suspected narcotics were sent to the Miami Valley Regional Crime Laboratory for analysis. The suspected narcotics were tested and found to be cocaine weighing 1.46 grams and fentanyl weighing .62 grams. The .45 caliber, Smith & Wesson Shield, semiautomatic handgun was found to be operable.

6. Alcohol Tobacco and Firearms Special Agent Christopher Reed advised the .45 caliber Smith and Wesson, M&P Shield, serial number HWY7669, semiautomatic handgun is not manufactured in the state of Ohio and, as such, had to move in interstate commerce to reach GOFF in this state.

7. I conducted a criminal history records check concerning Raheem GOFF. In doing so, I learned GOFF previously had been convicted of the following felonies in the Montgomery County, Ohio, Court of Pleas, each of which was punishable by a term of imprisonment exceeding one year – namely:

- a. Possession of Fentanyl-Related Compound (=OR >5G, <10G)(F3)
- b. Felonious assault (deadly weapon).

8. Based on the facts set forth in the Affidavit, your Affiant believes there is probable cause to believe that Raheem GOFF has violated 18 U.S.C. §§ 922(g)(1) and 924(a)(2) (possession of a firearm by a convicted felon).

*Michael Fuller*

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Michael T. Fuller  
Task Force Officer  
Federal Bureau of Investigation

Sworn to and subscribed before me this 17th day of March, 2021.

*Sharon L. Ovington*  
Sharon L. Ovington  
United States Magistrate Judge

